

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: CHARLOTTE DEAN DAVIS
PATRICK K DAVIS, Debtor(s)**

**Case No. 21-01647
CHAPTER 13**

**CHARLOTTE DEAN DAVIS
PATRICK K DAVIS**

PLAINTIFFS

V.

ADVERSARY NO. 23-00003-JAW

**ITAVIUS BURKS; ALISON CRAPPS,
SCOTT COUNTY TAX ASSESSOR;
BETTY ODOM, JUSTICE COURT CLERK;
MISSISSIPPI DEPARTMENT OF REVENUE**

DEFENDANTS

MOTION FOR DEFAULT JUDGEMENT

COME NOW Charlotte Dean Davis and Patrick K Davis, the Plaintiffs by and through counsel, and moves for rendition and entry of a Default Judgment and in support thereof, would show this Court as follows:

1. That on or about March 1, 2023, the Defendants, Itavius Burks, Alison Crapps and Betty Odom, were served through Mail Service.
2. That on or about March 3, 2023, the Defendant, Mississippi Department of Revenue (“MDoR”), was served through Mail Service.
2. That on or about April 7, 2023, Plaintiffs applied for Entry of Default against Defendants, Itavius Burks, Alison Crapps and Betty Odom.
3. That on or about April 10, 2023, an Entry of Default was entered by the Clerk against Defendants, Itavius Burks, Alison Crapps and Betty Odom.
4. That Plaintiffs is entitled to a judgment as follows:

- a) this Court should set aside the tax sale conducted on October 31, 2022 as void ab initio, respecting the 1997 BELM SUMMIT Mobile Home (VIN 33136) of plaintiffs;
- b) Mississippi Department of Revenue should issue a title to the 1997 BELM SUMMIT Mobile Home (VIN 33136, Title Number MS0163186944) listing Charlotte Dean Davis and Patrick K Davis as owners.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully moves this Court to render a Default Judgment in favor of the Plaintiffs. Plaintiffs further requests any additional relief, general or specific to which she may be entitled.

Respectfully Submitted,
Charlotte Dean Davis and Patrick K Davis
Plaintiffs

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.
Attorney for Plaintiffs

Prepared by:

Thomas C. Rollins, Jr. (MSB # 103469)
The Rollins Law Firm, PLLC
774 Avery Blvd. North
Ridgeland, MS 39157
601.600.5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., Attorney for the Plaintiffs, do hereby certify that I have mailed, by United States Mail, regular mail, postage prepaid, or electronically submitted, a true and correct copy of the Motion for Default Judgment on the day and year hereinafter set forth to the following:

By Mail:

Itavius Burks
54 Kerish Rd.
Forest, MS 39074

Alison Crapps
Scott County Tax Assessor
100 E First St.
Forest, MS 39074

Betty Odom, Justice Court Clerk
P.O. Box 371
Forest, MS 39074

By CM/ECF Notice:

Case Trustee

United States Trustee

SO CERTIFIED this 24th day of April, 2023.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.